

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

**DONNA CURLING, ET AL.,
Plaintiffs,**

v.

**BRAD RAFFENSPERGER, ET AL.,
Defendants.**

**DECLARATION OF DONNA
PRICE IN SUPPORT OF
CURLING PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION**

Civil Action No. 1:17-CV-2989-AT

DONNA PRICE, declares, under penalty of perjury, pursuant to 28 U.S.C. § 1746, that the following is true and correct:

1. My name is Donna Price. I am an elector of the State of Georgia and a resident of DeKalb County. I have personal knowledge of the facts in this declaration and, if called to testify as a witness, I would testify under oath to these facts.

2. I hereby incorporate my previous declarations as filed in this case as if fully restated verbatim herein.

3. I am currently registered to vote in DeKalb County, Georgia.

4. I intend to vote in all future elections for which I am eligible—including in the upcoming November 3, 2020 presidential elections, on absentee hand-marked

paper ballots or if offered the option, hand-marked paper ballots at my polling place, so that I will know there is a verified, software-independent record of my vote.

5. In my capacity as director of Georgians for Verified Voting (“GAVV”), a nonpartisan organization that I founded in 2003 following concerns about the security of Georgia’s electronic voting system, I have worked with legislators from the Republican and Democratic Parties, and representatives of the Green, Independent, and Constitutional parties, and concerned Georgia voters, to work towards secure, transparent, accurate and verifiable elections in Georgia.

6. In my capacity as director of GAVV, I have gained considerable knowledge about election integrity issues and Georgia’s GEMS/DRE voting system.

7. I have learned of the extreme vulnerability of Georgia’s GEMS/DRE election system to undetectable errors and malicious tampering, and the failure of the system to provide a voter-verified mechanism, independent of software, for auditing the electronic results.

8. I have also learned of threats to the security, transparency, and verifiability of Georgia elections posed by implementation of the BMD-based election system by Dominion Voting Systems, Inc. and selected by the Georgia Secretary of State’s office (the “Election System”). The Election System calls for all in-person voting to be conducted on in-precinct scanners/tabulators that read

summary paper records generated by electronic ballot-marking devices (“BMDs”) from which votes are tabulated using an unverifiable, non-human-readable Quick-Response (“QR”) code.

9. Georgia voters, including myself, are expected to trust that our votes are secure and counted in the face of numerous threats and vulnerabilities in our system. I cannot read a QR code, and so I cannot verify upon voting that the BMD accurately recorded the votes I intend to cast on the paper ballot it produces. Accordingly, without a durable, software-independent, voter-verified record to audit, I have no confidence that the results of a given election conducted using the Election System will be accurate and reliable.

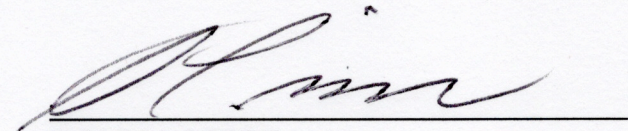
10. I understand that the Election System thus suffers from systemic vulnerabilities to advanced persistent threats, just as Georgia’s GEMS/DRE election system did.

11. If Georgia conducts additional elections on this Election System, I will be forced to vote on a system that I cannot reasonably trust to count my vote equally and fully, or to jump through additional bureaucratic hoops to vote using an absentee paper ballot, including requesting an absentee ballot by mail.

12. Were the Court to order that Georgia cannot implement and use the Election System, but must instead use hand-marked paper ballots for all voters who

can hand mark, which a voter can review to verify that her votes are cast as intended and will be counted as cast, I would perceive less risk in casting my ballot in-person.

I declare under penalty of the perjury laws of the State of Georgia and the United States that the foregoing is true and correct and that this declaration was executed this 19th day of August, 2020, in Atlanta, Georgia.


DONNA PRICE